

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,)
) INDICTMENT CR 10-251 PAM/AJB
Plaintiff,)
) (18 U.S.C. § 1028A)
v.) (18 U.S.C. § 1029(a)(2))
) (18 U.S.C. § 1542)
PETER BRUCE MATHEWS,) (42 U.S.C. § 408(a)(7)(B))
a/k/a Peter Hammer,)
)
Defendant.)

THE UNITED STATES GRAND JURY CHARGES THAT:

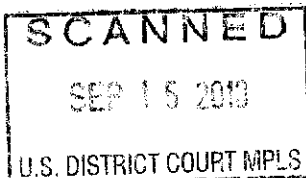
COUNT 1

(False Statement in Application for Passport)

On or about April 17, 2007, in the State and District of
Minnesota, the defendant,

PETER BRUCE MATHEWS,
a/k/a Peter Hammer,

did willfully and knowingly make a false statement in an
application for passport, with the intent to induce and secure the
issuance of a passport under the authority of the United States,
either for his own use, or the use of another, contrary to the laws
regulating the issuance of passports or the rules prescribed
pursuant to such laws, to wit: the defendant submitted a passport
application using the name, date of birth, and social security
number belonging to R.G.H. and represented the information to be
his own; all in violation of Title 18, United States Code, Section
1542.



FILED SEP 15 2010
RICHARD D. SLEETER, CLERK
JUDGMENT ENTERED
U.S. DISTRICT COURT MPLS

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COUNT 2

(False Statement in Application for Passport)

On or about March 24, 2009, in the State and District of Minnesota, the defendant,

PETER BRUCE MATHEWS,
a/k/a Peter Hammer,

did willfully and knowingly make a false statement in an application for passport, with the intent to induce and secure the issuance of a passport under the authority of the United States, either for his own use, or the use of another, contrary to the laws regulating the issuance of passports or the rules prescribed pursuant to such laws, to wit: the defendant submitted a passport application using the social security number belonging to G.J. and represented the information to be his own; all in violation of Title 18, United States Code, Section 1542.

COUNT 3

(Social Security Fraud)

On or about April 18, 2007, in the State and District of Minnesota, the defendant,

PETER BRUCE MATHEWS,
a/k/a Peter Hammer,

for the purpose of obtaining a benefit to which he was not entitled, did knowingly, willfully, and with the intent to deceive, make a materially false statement in a passport application, using the name of R.G.H., a deceased person, and falsely and fraudulently

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representing his social security number to be XXX-XX-7044, when in fact this social security number was falsely and fraudulently obtained by defendant, and is not the social security account number assigned by the Commissioner of Social Security to defendant; all in violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNT 4

(Social Security Fraud)

On or about March 29, 2009, in the State and District of Minnesota, the defendant,

PETER BRUCE MATHEWS,
a/k/a Peter Hammer,

for the purpose of obtaining a benefit to which he was not entitled, did knowingly, willfully, and with the intent to deceive, make a materially false statement in a passport application, using falsely and fraudulently representing his social security number to be XXX-XX-2010, when in fact this social security number was falsely and fraudulently obtained by defendant, and is not the social security account number assigned by the Commissioner of Social Security to defendant; all in violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNT 5

(Access Device Fraud)

On or about July 30, 2010, in the State and District of Minnesota, the defendant,

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PETER BRUCE MATHEWS,
a/k/a Peter Hammer,

did knowingly and with intent to defraud, use one or more unauthorized access devices during a one-year period, and by such conduct, obtained a thing of value aggregating \$1,000 or more during that period, to wit: various personal items and electronic merchandise purchased by using an unauthorized Discover credit card; all in violation of Title 18, United States Code, Sections 1029(a)(2) and 1029(c)(1)(A).

COUNTS 6-9

(Aggravated Identity Theft)

On or about the dates set forth below, in the State and District of Minnesota, the defendant,

PETER BRUCE MATHEWS,
a/k/a Peter Hammer,

did knowingly possess and use, without lawful authority, a means of identification of another person, to wit: the name, date of birth, and social security number, belonging to a real person, as alleged in each count below, during and in relation to the commission of a felony violation enumerated in subsection (c), to wit, Passport Fraud and Social Security Fraud:

Count	Date(s)	Description
6	April 18, 2007	Unlawful use of name and social security number of R.G.H., a deceased person, during commission of Passport Fraud as alleged in Count 1

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Count	Date(s)	Description
7	March 24, 2009	Unlawful use of social security number of G.J., during commission of Passport Fraud as alleged in Count 2
8	April 18, 2008	Unlawful use of social security number of R.G.H., a deceased person, during commission of Social Security Fraud as alleged in Count 3
9	March 24, 2009	Unlawful use of social security number of G.J., during commission of Social Security Fraud as alleged in Count 4.

All in violation of Title 18, United States Code, Sections 1028A and 2.

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON